



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 22, 2024

**VIA ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: SeanPaul Reyes v. The City of New York, 23 Civ. 6369 (JGLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. I write with the consent of plaintiff's counsel to respectfully request that defendant be permitted to exceed the 25 page limit in its Memorandum of Law in support of its anticipated motion to dismiss plaintiff's amended complaint. Defendant respectfully requests permission to submit a 35 page Memorandum of Law. The reason for the request is the multitude of claims that will have to be addressed in defendant's motion, including the new claims pled in plaintiff's amended complaint. The issues are also sufficiently complex such that the excess pages are needed to fully address the claims. Defendant consents to plaintiff receiving permission to also submit a 35 page Memorandum of Law in opposition to defendant's anticipated motion to dismiss.

Additionally, in light of the filings at Dockets 67, 68 and 69, as well as the Clerk's notice of a deficient pleading of January 19, 2024, the parties have agreed to February 5, 2024 as the due date for the City's response to plaintiff's amended complaint. The City respectfully requests that the Court so-order February 5, 2024 as the due date for the City's response to plaintiff's amended complaint.

This is the first such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)